



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

June 9, 2021

U0636RK

CERTIFIED MAIL NO. 7020 1290 0001 2736 8794
RETURN RECEIPT REQUESTED

Rear Admiral Robert B. Chadwick II
Commander, Navy Region Hawaii
850 Ticonderoga Street
Pearl Harbor, Hawaii 96860-5101

Dear RADM Chadwick:

SUBJECT: Red Hill Bulk Fuel Facility
Pearl Harbor, Hawaii
UST Facility ID No. 9-102271/ UST Release ID No. 210012
HEER Incident Release Case No. 20210507-0852

RELEASE CONFIRMATION AND REQUEST FOR INFORMATION

A suspected release was reported to the Department of Health (DOH), Underground Storage Tank (UST) Section on May 7, 2021 for failed pipeline coupling joints near Tanks 18 and 20 of the subject facility that occurred on May 6, 2021. We understand from the U.S. Navy (Navy) that contents of the pipeline released onto the tunnel walls and floor. Following product removal and cleaning of the tunnel and of certain soil vapor vaults, soil vapor (SV) samples from existing probes beneath the fuel tanks were collected and measured by photoionization detector (PID). Field measurements of up to 232,667 parts per billion by volume as obtained from soil probe 20 M beneath Tank 20 were recorded. SV samples were then obtained by Summa cannister and sent to an analytical laboratory. Chromatograms of soil vapor collected using Summa canisters received by the DOH on June 3, 2021 verify the PID data. This confirms that a release has occurred to the environment. The DOH-UST Section has assigned the confirmed UST Release ID 210012 for this event.

Hawaii Administrative Rules (HAR) 11-451, Hawaii State Contingency Plan requires that the Navy Region Hawaii and the Defense Logistics Agency (DLA) conduct response actions to prevent or minimize the release of oil so that it does not migrate to cause substantial danger to present or future public health or welfare, the environment, or natural resources.

HAR Title 11, Chapter 280.1, "Underground Storage Tanks," Subchapter 6 Release Response Action, requires UST owners and operators to investigate releases of

regulated substances from their UST systems. Guidance documents can be found on the DOH-UST Section website at: <http://health.hawaii.gov/shwb/>.

Owners and operators must measure for the presence of a release where contamination is most likely to be present at the UST site. In selecting sample types and locations, owners and operators must consider the nature of the stored substance, the initial alarm or cause for suspicion, type of backfill and surrounding soil, depth and flow gradient of groundwater and other factors appropriate for identifying the presence and source of the release.

The DOH-Hazard Evaluation and Emergency Response (HEER) Office, *Technical Guidance Manual* (TGM) describes laboratory analyses required and sampling recommended by fuel type in Section 9.3, SUPPLEMENTAL GUIDANCE FOR SELECT CONTAMINANTS OF CONCERN – Petroleum Contaminated Sites, Table 9-5. These methods are appropriate and expected for characterizing the nature and extent of the release and any associated hazards, unless otherwise approved or directed by the DOH. Information on can be found at: <http://www.hawaiidoh.org/>.

Owners and operators of confirmed UST release sites will send the following documentation to the DOH, Solid and Hazardous Waste Branch, located at 2827 Waimano Home Road, #100, Pearl City, Hawaii 96782:

1. **Confirmed Release Notification Form** - Within seven (7) days of identifying the release.
2. **Initial Abatement Measures and Site Assessment** - Within 20 days after release confirmation, owners and operators must submit a report to this office summarizing the initial abatement steps taken under HAR 11-280.1-62(a) and any resulting information or data.
3. **Initial Site Characterization Report** - Within 45 days of release confirmation and includes data on the nature and estimated quantity of the release, data from available sources and previous site investigations, soil abatement activities, groundwater and/or SV sampling data, water quality, use and location of wells in the area, location of utilities, and other requirements in accordance with HAR 11-280.1-63. Follow the format of a Site Investigation Report in Section 18.5.9 of the DOH-HEER TGM.
4. **Free Product Removal** - Removal of petroleum free product to the maximum extent practicable in accordance with HAR 11-280.1-64. If free product is found in the subsurface of a confirmed UST release site, then a Free Product Removal Report is due to this office within 45 days of confirming the release.

5. **Notification of Members of the Affected Public** - Within 90 days of confirming a release, owners and operators shall notify members of the public in writing who are directly affected by the confirmed release in accordance with HAR 11-280.1-65.1. These include landowners, lessors, lessees, and easement holders at the release site.
6. **Release Response Reporting** - No later than 90 days following a confirmed release, the first quarterly status report due should include all release response actions taken in the first 90 days and a plan for future release response action. Follow the format for a Site Investigation Report in Section 18.5.9 of the DOH-HEER TGM. If release response activities continue beyond 90 days, please include the details in the Quarterly Release Response Reports for your facility that are due every 90 days.
7. **DOH Technical Guidance** - The DOH-UST Section has adopted the DOH-HEER TGM and the DOH-HEER guidance for UST release response investigations including multi-increment sampling of soil, groundwater, and SV sampling. Please ensure all future sampling events are in accordance with the DOH-HEER TGM and the DOH-HEER guidance, available at our website.

In order to improve our understanding of the release, the DOH requests additional information pursuant to Hawaii Revised Statutes (HRS) §342L-7, which reads:

For the purpose of developing or assisting in the development of any rule, conducting any study, taking any release response action, or enforcing this chapter, any owner or operator of an underground storage or tank system, and any person involved in response actions relating to any releases from these tanks or tank systems, upon the request of any duly authorized representative of the department, shall:

- (1) furnish information relating to the tanks or tank systems, including tank equipment and contents and any response actions relating to release from the tanks or tank systems;*
- (2) conduct monitoring or testing; and*
- (3) permit the designated representative at all reasonable times to have access to, and to copy all records relating to the tanks or tank systems.*

Pursuant to HRS §342L-7, the DOH hereby requests that the Navy and DLA provide responses to the items listed in the attached “Request for Information” within thirty (30) days upon receipt of this letter. Pursuant to HRS §342L-10(b)(2), if the Navy and DLA fails to provide the information requested herein, the DOH may assess fines against the Navy and DLA up to \$500 for each day it fails to provide the information. Please have

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your response to this request signed and dated by an authorized representative of the Navy with direct knowledge of the Red Hill Bulk Fuel Storage facility and be sent to:

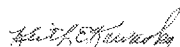
Roxanne Kwan, Supervisor
Underground Storage Tank Section
Solid and Hazardous Waste Branch
Hawaii Department of Health
2827 Waimano Home Road, #100
Pearl City, Hawaii 96782

If any of the information provided is entitled to confidential treatment as either a trade secret or confidential business information, please submit a claim of confidentiality under HRS 342L-15. Submit the claim with the response to this request and explain: 1) which information is considered confidential; and 2) why the information is confidential. Be detailed and descriptive as much as possible. With this information, the DOH can determine whether it can protect the information under HRS §342L-7 and §342L-15 and HRS chapter 92F, since certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by the DOH, the information may be made available to the public without further notice.

Please include your DOH-UST Facility ID and Release ID numbers on all future correspondence regarding this release. An electronic copy in a single pdf file on CD is required for each report submitted to the DOH-UST Section. We appreciate your cooperation and prompt attention to this matter.

If you have any questions regarding this letter, please contact Ms. Roxanne Kwan at (808) 586-4226 or by email: roxanne.kwan@doh.hawaii.gov.

Sincerely,



KEITH E. KAWAOKA, D.Env.
Deputy Director for Environmental Health

Enclosure: Request for Information

ATTACHMENT

REQUEST FOR INFORMATION

1. Provide description and detail timeline of incident and actions taken by the Navy to protect human life and the environment until emergency was stabilized.
2. Provide an explanation for the suspected cause of the pipeline failure and release.
3. Provide a top view map and photos that includes details of all fuel release points, fuel flow paths, fuel containment areas, and the following affected equipment: pipelines (including lengths), couplings, pipeline skillets, end caps, valve locations, pump locations or other parts in relation to the transfer pipelines and affected tanks within the facility.
4. Provide calculations and documentation to support fuel release and capture quantities, including but not limited to the following documents:
 - a. Tank 20 (JP5) Daily Ledger Inventory Report from May 5 through May 11, 2021;
 - b. Control Room Operator Day/Night logs from May 5 through May 11, 2021;
 - c. Tank 311 (Sump Tank) Inventory Report Day/Night logs from May 5 through May 11, 2021; and
 - d. Red Hill Tank Daily Level logs and Control Room log for Tank 20 levels from May 5 through May 11, 2021.
5. If not provided in the documents listed in Item 4, provide all fuel movement, Tank 20 fuel levels, pipeline pressure measurements, pump status, valve status, and alarm records from period prior to Tank 20 refueling and 4 hours after the release event on May 6, 2021.
6. Provide maintenance and repair/replacement records for all skin and isolation valves for JP-5, F-24, and F-76 pipelines connecting to Red Hill underground storage tanks. Provide a table with current operational age of each skin valve and isolation valve.
7. Provide a copy of the current Joint Base Pearl Harbor Pipeline Integrity Management Plan.
8. Provide information on Navy plans for repairing or replacement, and testing of all pipelines, valves, and tanks impacted by the incident.

9. Provide a copy of the current Red Hill Bulk Fuel Storage Facility Release Response Plan.

For each and every item listed, if information responsive to this Request for Information is not in your possession, custody or control, then identify the persons from whom such information may be obtained. For each individual please provide the following: name, last known or current address, telephone number and affiliation with Navy or the site.